

EXHIBIT 21
(Unsealed)
(Previously Filed Under Seal as Dkt. 392)

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION, a Delaware corporation,) Case No: 16-cv-1054 (WMW/DTS)
Plaintiff,)
v.)
FEDERAL INSURANCE COMPANY, An Indiana corporation, and ACE AMERICAN INSURANCE COMPANY, a Pennsylvania corporation)
Defendants.)

EXPERT REPORT OF WILLIAM S. MCCARTER

May 17th, 2019

CONFIDENTIAL – ATTORNEY'S EYES ONLY

88. Blaze is only used in 10 of Federal's 1,500 applications.³⁷ Additionally, each application is made up of multiple internally developed programs and potentially uses Third-party technologies.³⁸ It is common for insurance companies to leverage functionality from third-party software providers who specialize in certain software functions.

89. Based on my review of Third-Party technologies used by Federal, Blaze is 1 of 45 Third-Party software technologies used by Federal.

90. Based on my review, I am estimating that Federal has a total of 1,545 technologies that are used to build and implement its business applications. Blaze is 1 technology of Federal's 1,545 technologies or 0.06%.

91. Blaze does not have insurance processing functionality and Federal provided all the insurance applications that utilize Blaze for rules management functionality. Blaze only works when it is integrated with core insurance applications that have the required insurance functionality for selling and servicing insurance policies.³⁹

B. Federal Insurance Policy Administration Systems

92. Federal has a large and complex set of insurance applications including many policy administration systems. A "policy administration system is the system of record for all policies that an insurance company has written. A policy administration system is a repository of policy-level data related to objects of insurance, coverages, limits, conditions, exclusions, duration of the policy, endorsements. In actual practice, an insurer uses a policy administration system either by itself or closely integrated with specific technologies. The policy administration system is used to execute a number of core processes, and relies on several types of supporting capabilities".⁴⁰

93. Based on my experience, it is common in the insurance industry for large multiple product insurance company's like Federal to have many policy administration systems to support different insurance products. Federal's policy administration systems are customized to its insurance products and geographic requirements.

³⁷ FED017914_0001.

³⁸ Appendix B to this report.

³⁹ *Ivy Deposition*. Pg. 11:17-19

⁴⁰ Celent. 2016. *NORTH AMERICAN POLICY ADMINISTRATION SYSTEMS PROPERTY & CASUALTY, GENERAL, AND SPECIALTY LINES ABCD VENDOR VIEW*. pg. 5. Boston MA.